



Resolute Forest Products – Catawba Mill

5300 Cureton Ferry Road
Post Office Box 7
Catawba, SC 29704-0007

FED EX NO. 7742 9788 5526

January 28, 2019

Manager, Air Toxics Section
SCDHEC Bureau of Air Quality
2600 Bull Street
Columbia SC 29201-1708

Re: Resolute Forest Products – Catawba Operations, Permit No. TV-2440-0005

Manager, Air Toxics Section:

The purpose of this submittal is to meet the semi-annual reporting requirements applicable to the Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart S). This submittal meets the requirements for both the Periodic Startup, Shutdown, and Malfunction (SSM) Report and the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.10(d)(5)(i) and 63.10(e)(3), respectively.

The summary reports are attached as allowed in Section 63.10(e)(3)(vii). For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s).

The total of steam stripper downtime plus time of excess emissions during the reporting period did not exceed ten percent as allowed in Section 63.446(g). Actions taken during SSM events, including corrective actions, were consistent with the procedures specified in the SSM Plan for this facility.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

This is the final MACT I report that Resolute FP US Inc. will submit for TV permit 2440-0005 because this permit is being transferred to New-Indy Catawba LLC pursuant to the application of ownership change submitted on January 25, 2019. Further communication on this matter should be directed to Bob Tourville at bob.tourville@new-indycb.com.

If you have any questions or require additional information, please contact Mike Swanson at (803) 981-8010 or at mike.swanson@new-indycb.com

Sincerely,

David Clemmons
Interim General Manager

Attachments: MACT I Logs

cc: EPA Region 4
SCDHEC – BAQ, Technical Management Section
Alex Latta, Midlands EQC Lancaster
Environmental File 231.18

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Chlorine
Time Period: 3-Hour Average
Reporting Period: July 1, 2018 through December 31, 2018
Process Unit Description: Bleach Plant Scrubber System

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Scrubber Outlet Conc. <10 ppmv Cl₂ (40 CFR 63.445 (c)(2))

Operating Parameters: Scrubber liquid influent (recirculation) flow > 87 gpm
Scrubber effluent pH > 10.4
Scrubber fan operational status - ON

Monitor Manufacturer(s) and Model Number(s): Liquid flow / Foxboro IMT24 PDAB810MAB
pH / TBI TBX557-J1E11f20JB

Last CMS Certification or Audit Date: Flow Meter Audit (Calibration): 5/7/2018
pH (Calibration): 11/16/2018

Total Source Operating Time in Reporting Period: 4,371 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	4.3 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	3
Percent Monitor Downtime	0.10 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Interim General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol
Time Period: 15-day rolling average
Reporting Period: July 1, 2018 through December 31, 2018
Process Unit Description: Condensate Collection and Treatment System

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3))
Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))

Operating Parameters: Condensate Feed Rate, Condensate Feed Temperature, Steam Flow
Effective Steam Ratio (condensate feed rate / (steam flow to column
less steam for condensate preheat) > 16 = 92%

Monitor Manufacturer(s) and Model Number(s): Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6
Steam Flow - Rosemount /3051CD2A22A1JB4L4M6
Condensate Temperature – Rosemount/3144D5E5B4T1M5

Last CMS Certification or Audit Date: Condensate Flow (calibration): 5/15/2018
Steam Flow (calibration): 5/15/2018
Condensate Temperature (calibration): 5/15/2018

Total Source Operating Time in Reporting Period: 4,374 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	0 Hour
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hours
Total Number of Incidents	0
Excess Emissions / Process Operating Time	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	NA

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Interim General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: July 1, 2018 through December 31, 2018

Process Unit Description: LVHC System – Combination Boilers

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 4,374 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	Duration
<i>Note: Specific incidents are shown on the attached log for SSM purposes</i>	A. Startup/Shutdown	0.5 Hours
	B. Malfunctions	
	Process/Instrument System	0.2 Hours
	Control/Operating/Collection	0 Hours
	Other Known Cause	19.8 Hours
	Other Unknown Cause	0 Hours
	Total Number of Incidents	14
	Excess Emissions / Process Operating Time	0.47%
	Total Duration of Excess Emissions excluding SSM	
	Plan Excess Emissions/ Process Operating Time	0.45%

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Interim General Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: July 1, 2018 through December 31, 2018

Process Unit Description: HVLC System – Combination Boilers

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 4,374 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	Duration
<i>Note: Specific incidents are shown on the attached log for SSM purposes</i>	A. Startup/Shutdown	0.0 Hour
	B. Malfunctions	
	Process/Instrument System	0.0 Hours
	Control/Operating/Collection	0.0 Hours
	Other Known Cause	5.5 Hours
	Other Unknown Cause	0.0 Hour
	Total Number of Incidents	4
	Excess Emissions / Process Operating Time	0.13%
	Total Duration of Excess Emissions excluding SSM	
	Plan Excess Emissions/ Process Operating Time	0.13%

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Interim General Manager

Signature: _____